

**BALDASSARE
& MARA, LLC**
Attorneys at Law


VIA ECF

October 2, 2020

The Honorable Ronnie Abrams,
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.


Ronnie Abrams, U.S.D.J.
October 5, 2020

Re: United States v. Ajit Singh, et al., Case No. 19-cr-339 (RA)

Dear Judge Abrams:

This firm represents Defendant Ajit Singh in the above-referenced matter. Together with our co-counsel, Steven Brill, the attorney for Gulsahil Singh, we respectfully request a modification of the respective bail conditions of Ajit and Gulsahil Singh.

Counsel has consulted with the Government and Pretrial Services. In the interest of clarity for all parties involved, we respectfully request that the bail conditions for Ajit and Gulsahil Singh be modified to allow a curfew enforced by location monitoring permitting them to leave home from 6:00 am to 10:00 pm, all days of the week.

We have consulted with the Government and they consent to this request. We have notified Pretrial Services regarding this matter and they do not object to this request.

Thank you for your consideration in this matter.

Respectfully,



Michael Baldassare

cc: Juliana Murray, AUSA
Steven Brill, Attorney for Gulsahil Singh